

1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

3 CALIFORNIA COALITION FOR WOMEN  
4 PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;  
G.M.; A.S.; and L.T., individuals on behalf of  
themselves and all others similarly situated,

CASE NO. 4:23-CV-04155-YGR

5 Plaintiffs

6 v.

7 UNITED STATES OF AMERICA FEDERAL  
BUREAU OF PRISONS, a governmental entity;  
8 BUREAU OF PRISONS DIRECTOR  
COLETTE PETERS, in her official capacity;  
9 FCI DUBLIN WARDEN THAHESHA JUSINO,  
in her official capacity; OFFICER  
10 BELLHOUSE, in his individual capacity;  
OFFICER GACAD, in his individual capacity;  
11 OFFICER JONES, in his individual capacity;  
LIEUTENANT JONES, in her individual  
12 capacity; OFFICER LEWIS, in his individual  
capacity; OFFICER NUNLEY, in his individual  
13 capacity, OFFICER POOL, in his individual  
capacity, LIEUTENANT PUTNAM, in his  
14 individual capacity; OFFICER SERRANO, in  
his individual capacity; OFFICER SHIRLEY, in  
15 his individual capacity; OFFICER SMITH, in his  
individual capacity; and OFFICER VASQUEZ,  
16 in her individual capacity,

**DECLARATION OF DENNIS M. WONG**

17 Defendants.

18 I, Dennis M. Wong, hereby declare as follows:

19 1. I am the Regional Counsel for the Western Region for the Federal Bureau of Prisons (“BOP”). I  
have been in this position since 2012 and have worked as an attorney for the BOP since 1994.  
20 As Regional Counsel, I oversee BOP legal offices that provide legal counsel to federal prisons in  
the Western Region, by managing supervisory-level attorneys in the Western Region. My  
21 responsibilities include managing resources to support my legal staff, providing legal guidance to  
BOP staff, and providing litigation support to the U.S. Attorney’s Offices as needed. As part of  
22 the litigation support process, I obtain and review applicable records and communicate with BOP  
staff in order to prepare documents that will be used in litigation, such as a declaration.  
23 2. I am familiar with, and have regular access to BOP records and databases, and routinely obtain  
24 and review such records as part of my duties as Regional Counsel.

1 3. [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 4. [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]

21 I declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and  
22 correct. Executed this 23rd day of February 2024.

23   
24 DENNIS M. WONG  
25 Regional Counsel  
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